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10 *Attorneys for Defendant*
Tata America International Corporation

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**

13 DANIEL ALVAREZ,
14 Plaintiff,

15 vs.

16 TATA AMERICA INTERNATIONAL
17 CORPORATION, a New York Corporation,
18 Defendant.

Case No. 2:18-cv-01733-RFB-NJK

**STIPULATED NOTICE OF
SETTLEMENT AND REQUEST FOR
STAY OF PRE-TRIAL DEADLINES**

19 Plaintiff Daniel Alvarez and Defendant Tata America International Corporation, by and
20 through their respective counsel, hereby file this Stipulated Notice of Settlement and Request for
21 Stay of Pre-Trial Deadlines.

22 The parties reached a resolution of this case following the mediation conducted on Friday,
23 January 31, 2020. The parties request additional time to execute settlement documents and submit
24 a stipulation seeking dismissal with prejudice of this entire case.

25 Accordingly, the parties respectfully request that the Court stay all pending pretrial deadlines
26 in the Discovery Scheduling Plan and Order and the Court's Order dated January 21, 2020 (ECF
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1 No. 47) (e.g., deadline to file dispositive motions and joint pretrial order, etc.), to allow the parties
2 to conclude resolution of this case without incurring additional fees and costs to comply with pre-
3 trial deadlines.

4 DATED this 14th day of February, 2020.

5 LAW OFFICES OF MICHAEL P. BALABAN

JACKSON LEWIS P.C.

6 /s/ Michael P. Balaban

7 Michael P. Balaban, Esq.
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9 10726 Del Rudini Street
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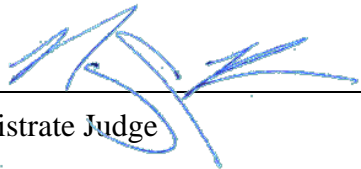
11 *Attorney for Daniel Alvarez*

*Attorneys for Tata America
International Corporation*

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16 **ORDER**

17 A stipulation of dismissal shall be filed no later than March 9, 2020.

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19 IT IS SO ORDERED February 18, 2020.

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22 U.S. Magistrate Judge
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